

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
SUEANN KOMINSKI :
LON K. KOMINSKI, JR. :
a/k/a Lon Kominski :
a/k/a Lon Kominski, Jr. :
a/k/a Lon Kevin Kominski, Jr. : CASE NO. 5:18-bk-05198 MJC

Debtor(s)

ANSWER TO RESPONSE TO NOTICE OF FINAL CURE

AND NOW comes the Debtor(s) by and through his attorney, C. STEPHEN GURDIN, ESQUIRE, and respectfully represent(s) as follows:

1. The Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code on January 31, 2013.
2. The Debtor's residence is encumbered by a mortgage by the Bank of New York Mellon (the Mortgage Lender).
3. The Chapter 13 Trustee filed a Notice of Final Cure Payment on January 23, 2024, indicating that the prepetition arrears had been paid.
4. On February 12, 2024, the Mortgage Lender filed a Response (the Response) to the Notice of Final Cure, alleging that Debtor is in arrears post-petition in the amount of \$1,172.64.
5. On February 28, 2024, the female debtor contacted their servicer, Carrington Mortgage Services, LLC (the mortgage servicer). She made payment in the amount of \$208.00, confirmation number 29377958. She also asked the servicer to

take \$500.00 out of suspense and apply it to the February mortgage payment, bringing the loan current.

6. A discrepancy exists between the amount of the arrears as stated in the Response and the amount accounted for in the Debtors' records of their payments.

WHEREFORE, the Debtor(s) respectfully requests that this Court schedule a hearing on the Response to Notice of Final Cure Payment.

Respectfully submitted

/s/C. Stephen Gurdin, Esquire
C. STEPHEN GURDIN, ESQUIRE
Attorney for Debtor(s)
67-69 Public Square, Suite 501
WILKES-BARRE PA 18701-2512
Phone (570) 826-0481 fax (570) 822-7780
Email: Stephen@gurdinlaw.com
Paralegal email: Michelle@gurdinlaw.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
SUEANN KOMINSKI :
LON K. KOMINSKI, JR. :
a/k/a Lon Kominski :
a/k/a Lon Kominski, Jr. :
a/k/a Lon Kevin Kominski, Jr. : CASE NO. 5:18-bk-05198 MJC
: Debtor(s)

CERTIFICATE OF SERVICE

I, C. Stephen Gurdin, Esquire, being duly sworn according to law, hereby certify that on February 29, 2024, caused Debtor's Answer to Response to Notice of Final Cure Payment to be served via United States first-class mail, postage prepaid or electronically, upon the following persons:

CARRINGTON MORTGAGE SERVICES, LLC
1600 SOUTH DOUGLASS ROAD
ANAHEIM, CA 92806

MICHAEL FARRINGTON, ESQ.
701 MARKET ST., SUITE 5000
PHILADELPHIA, PA 16106

JACK N. ZAHAROPOULOS
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036

SUEANN KOMINSKI
LON K. KOMINSKI, JR.
527 WINTERDALE RD.
STARLIGHT, PA 18461

/s/C. Stephen Gurdin, Esquire
C. STEPHEN GURDIN, ESQUIRE
Attorney for Debtor(s)
67-69 Public Square, Suite 501
WILKES-BARRE PA 18701-2512
Phone (570) 826-0481 fax (570) 822-7780
e-mail Stephen@gurdinlaw.com
Additional e-mail: Michelle@gurdinlaw.com